

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**Civil Action No.
03 MDL 1570**

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This document relates to:

Burnett, et al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 03-cv-9849 (GBD)(SN) (S.D.N.Y.)

Thomas E. Burnett, Sr., et al. vs. Islamic Republic of Iran, et al., Case No. 15-CV-9903 (GBD)(SN) (S.D.N.Y.)

**MOTION TO SUBSTITUTE PARTIES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Federal Rule of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the following party in the above referenced actions. The individual being substituted into the case was identified as a “DOE” plaintiff at the time that the case was initially instituted; was identified as such in the initial pleadings; and has since consented to being named in the Complaints according to her legal name.

The following chart demonstrates the manner in which this individual was previously named in the Complaints and also identifies how she wishes to proceed going forward:

Identification of Party to be Substituted	State of Residency at Filing	Reference to Plaintiff in ECF No. 53 (15-cv-9903) and ECF No. 232-2 (02-cv-1616 (D.D.C.))	Paragraph of Complaint Discussing Party
KATHLEEN ANN STANTON, in their own right as an Injured Party	NY	DOE AP234, in their own right as an Injured Party / JANE DOE # 111 (AP234)	ECF No. 53 (15-cv-9903) at ¶4785; ECF No 232-2 (02-cv-1616 (D.D.C.))

Plaintiffs propose that, upon endorsement of Plaintiffs' Proposed Order, the substituted party would be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of the Court's Office and based on the size of this MDL.

Dated: September 22, 2021

Respectfully submitted,

/s/ John M. Eubanks

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